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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte; Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89;
Transforming the 2.5 GHz Band, WT Docket No. 18-120

Dear Ms. Dortch:

On Wednesday, October 24, 2018, Jim Lyon, General Manager, and Jonathan Hills, Wireless Network Manager, of Mark Twain Communications Company (“Mark Twain”) and their counsel, Clare Liedquist, Molly O’Conor, and the undersigned with Herman & Whiteaker, LLC, met with Umair Javed and Travis Litman, Advisors to Commissioner Jessica Rosenworcel of the Federal Communications Commission (“FCC” or “Commission”). During the meeting, Mr. Lyon and Mr. Hills discussed the potential negative impact of the proposed rule in the *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs* proceeding (“*National Security NPRM*”) on small rural telecommunications companies. Additionally, Mr. Lyon and Mr. Hills discussed the importance of the *Transforming the 2.5 GHz Band* proceeding for Mark Twain, as a small, rural provider.

Mr. Lyon described how Mark Twain is a small, rural telecommunications provider that serves northeast Missouri and receives federal universal service (“USF”) support. Mr. Lyon and Mr. Hills explained that Mark Twain switched to Huawei equipment after years of using unreliable equipment and has found it to be the most dependable and affordable option. Mr. Lyon further explained how the *National Security NPRM* has resulted in uncertainty for its equipment purchases and future deployment plans.

Mr. Lyon discussed how Mark Twain submitted bids in the Connect America Fund Phase II (“CAF II”) auction based on cost estimates for expanding its existing infrastructure, which currently includes Huawei equipment. Mr. Lyon and Mr. Hills urged the FCC to not adopt rules that would jeopardize receipt of USF funds by Mark Twain’s continued use of Huawei equipment and noted that should the FCC tie the use of certain equipment to the USF, Mark Twain’s wireless growth would likely be completely stalled for the foreseeable future.

Mr. Lyon and Mr. Hills explained that the *Transforming the 2.5 GHz Band* proceeding is extremely important to Mark Twain because it has a great relationship with the schools in its service area and 2.5 GHz spectrum is ideal for Mark Twain to build out. Mr. Hills explained that 2.5 GHz spectrum is preferable to 3.5 GHz because 3.5 GHz spectrum cannot propagate and works better as a supplement to 2.5 GHz spectrum. Mr. Hills explained that Mark Twain supports the local priority windows and aggressive buildout requirements because Mark Twain’s goal is to continue growing its service and 2.5 GHz spectrum would allow it to do so.

Pursuant to Section 1.1206(b) of the Commission’s Rules, we are filing this letter electronically in the above-captioned docket. Please contact the undersigned if you have any questions.

Respectfully submitted,



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Clare Liedquist
Molly O’Conor
*Counsel to Mark Twain Communications
Company*

Cc: Umair Javed (via email)
Travis Litman (via email)